

October 26, 2018

Via SCPSC E-FILING DMS

The Honorable Jocelyn G. Boyd
Chief Clerk/Administrator
Public Service Commission of South Carolina
101 Executive Center Drive
Columbia, SC 29210

**Re: Joint Application of Duke Energy Carolinas, LLC and Duke Energy Progress, LLC to
Establish Green Source Advantage Programs and Riders GSA;**

Docket No. 2018-320-E

Dear Ms. Boyd:

Please find attached for electronic filing with the South Carolina Public Service Commission ("Commission") a copy of the Petition to Intervene of Walmart Inc. ("Walmart"), in the above-referenced case. By copy of this letter, I am serving all parties of record via Electronic Mail and First-Class Mail.

Please contact us if you have any questions concerning this filing.

Sincerely,

SPILMAN THOMAS & BATTLE, PLLC

By 

Stephanie U. Eaton
(SC Bar No. 80073)

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Counsel to Walmart Inc.

SUE/sds
Attachments
c: Certificate of Service

BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2018-320-E

IN RE: Joint Application of Duke Energy Carolinas, LLC and Duke Energy Progress, LLC to Establish Green Source Advantage Programs and Riders GSA))))	PETITION TO INTERVENE OF WALMART INC.
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Pursuant to Rule 103-825 and other applicable rules and regulations of the South Carolina Public Service Commission ("Commission"), Walmart Inc. ("Walmart"), by its attorneys, respectfully requests that the Commission permit it to intervene and become a party in the above-captioned matter. In support of its Petition to Intervene, Walmart submits as follows:

1. On October 10, 2018, Duke Energy Carolinas, LLC ("DEC") and Duke Energy Progress, LLC ("DEP") (collectively, "Companies"), filed a Joint Application for approval to implement a Green Source Advantage Program ("GSA Program") and Rider GSA tariff ("Joint Application"). The Joint Application was filed pursuant to S.C. Code Ann. § 58-27-820, S.C. Code Ann. Regs. 103-823, the Rules of Practice and Procedure of the Public Service Commission of South Carolina.

2. Walmart is a global retailer of goods and services and also operates throughout the United States. Walmart's principal energy management office is located at 2001 SE 10th Street, Bentonville, AR 72716-0550.

3. Walmart has the privilege of providing its retail services in the State of South Carolina. Walmart is a large commercial customer of the Companies. Walmart has approximately 50 facilities in South Carolina that are served by the Companies, which include Walmart

Supercenters, Sam's Clubs, distribution centers, gas stations, and other facilities. Walmart purchases approximately 162 million kWh annually from the Companies. Electricity is one of the largest operating costs faced by Walmart. As a result, any modification to the Companies' electric rates and terms of service has the potential to substantially impact Walmart's operations in South Carolina.

4. Moreover, Walmart has established aggressive and significant renewable energy goals. In 2005, Walmart set an aspirational goal to be supplied 100 percent by renewable energy.¹ On November 4, 2016, Walmart announced new sustainability goals for 2025 that build on its existing energy goals and include sourcing half of its global energy needs from renewable sources, and, through a combination of renewable energy and energy efficiency, reducing emissions in its operations by 18 percent.² The Corporate Renewable Energy Buyer's Principles, published by World Resources Institute and World Wildlife Fund, and to which Walmart is a signatory, provides more detail around corporate customer renewable energy needs.³ In light of this commitment to renewable energy, Walmart is interested in having access to a renewable energy product within the Companies' service territories; however, Walmart is concerned with the structure and design of the Companies' proposed GSA Program and Rider GSA tariffs.

5. In addition, as a large commercial customer that purchases substantial amounts of electric and related services from the Companies pursuant to multiple accounts at multiple locations, Walmart has an interest in this proceeding that is not represented by any other party.

¹ <http://corporate.walmart.com/global-responsibility/environmental-sustainability>

² <http://news.walmart.com/2016/11/04/walmart-offers-new-vision-for-the-companys-role-in-society>

³ <http://buyersprinciples.org/principles/>

6. The attorneys representing Walmart in this proceeding are:

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Ms. Eaton is authorized to accept service of papers in this proceeding on behalf of Walmart. Walmart also respectfully requests that Mr. Williamson and Ms. Harris be added to the service list as Walmart may seek Mr. Williamson's and/or Ms. Harris' admission to appear before the Commission *pro hac vice* in the near future.

5. This Petition to Intervene is timely filed as the Commission has not yet established an intervention deadline for this proceeding.

WHEREFORE, Walmart Inc., respectfully requests that it be granted leave to intervene and be made a party to the above-captioned proceeding.

Respectfully submitted,

SPILMAN THOMAS & BATTLE, PLLC

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Counsel to Walmart Inc.

Dated: October 26, 2018

BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

DOCKET NO. 2018-320-E

IN RE: Joint Application of Duke Energy)	CERTIFICATE OF SERVICE
Carolinas, LLC and Duke Energy Progress,)	
LLC to Establish Green Source Advantage)	
Programs and Riders GSA)	

I hereby certify that I have this day served one (1) copy of the foregoing document upon the following parties to this proceeding via Electronic Mail and First-Class Mail:

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Dated: October 26, 2018